

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Case No. 09-10243-MLW
)	
v.)	
)	
RYAN HARRIS, a/k/a DerEngel,)	
)	
and)	
)	
TCNISO, INC.,)	
Defendants)	

GOVERNMENT'S MOTION TO CONTINUE
INITIAL STATUS CONFERENCE AND TO EXCLUDE TIME

The Government asks the Court to continue the initial status conference in this case from January 28, 2010 to February 22, 2010 at 9:30 a.m, in Boston.

In support of this motion, the Government states that AUSA Bookbinder will be on trial January 28, 2010 before Judge Stearns. Between that trial, a February trial for defense counsel, and school vacation week in February, the next day that works for all counsel is February 22.

The parties also jointly ask the Court to exclude from the speedy trial clock the time from January 1, 2010 to February 22, 2010. This time is excludable under 18 U.S.C. §3161(h)(7)(A), because the ends of justice served by allowing time for the government to identify and produce discovery and for the defense to begin to review that information outweighs the interest of the public and the defendant in a speedy trial. The parties therefore ask the Court to enter the attached proposed Order of Excludable Delay.

The defendant has assented, through counsel, to this motion.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Adam Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney
Mona Sedky Spivack
Department of Justice Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adam Bookbinder
Adam J. Bookbinder

Dated: January 12, 2010